

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TRACEY WHITE et. al.,)
)
Plaintiffs)
) Cause No. 14-cv-01490-HEA
)
v.)
)
THOMAS JACKSON et. al.,)

CONSENT MOTION FOR A FURTHER EXTENSION OF TIME UNTIL MAY 26, 2016 TO RESPOND TO ST. LOUIS COUNTY DEFENDANTS MOTION TO EXCLUDE EXPERT

Come now the plaintiffs, by and through counsel, and hereby move for a further extension of time until May 26, 2016 to respond to the defendants' and motion to exclude expert until May 26, 2016. In support thereof, plaintiffs aver as follows: 1. On April 29, 2016, the defendants filed a motion a motion to exclude expert (document 153 and 154).

Wherefore, for the reasons stated herein, and in the record of this proceeding, plaintiffs respectfully request that the Court grant them an extension of time until May 25, 2016 to file their response to defendants' motion. Plaintiff's counsel mistakenly thought the deadline had been extended, when in fact only a similar Motion to Exclude

Expert filed on 4/9/2016 by the Ferguson defendants by was granted a consent extension. This extension was obtained by lead counsel Gregory L. Lattimer. Counsel Shabazz, thinking the motion to exclude had been extended turned his attention to other matters has been consumed with other litigation duties, including preparation for a pre-trial hearing in the District of Columbia on May, 18 2016. Counsel apologizes for missing the deadline for the motion in question and hereby requests that the Honorable Court grant the consent motion.

CERTIFICATION OF COUNSEL:

Undersigned counsel's office contacted counsel for the moving defendants, Michael Hughes, to obtain defendants' position regarding the relief requested herein. Mr. Hughes indicated that the defendants consent to the relief requested herein. Counsel for the St. Louis County defendants, Mr. Michael Hughes, also consents to the relief requested herein.

Respectfully submitted,

By /s/ Malik Z. Shabazz
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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served by the court's
electronic filing to all counsel of record this 24th day of, 2016.

/s/ Malik Z. Shabazz